

EXHIBIT 19

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1 UNITED STATES DISTRICT COUR
2 SOUTHERN DISTRICT OF OHIO
3 WESTERN DIVISION

5 VIVIAN BERT, et al., :
6 Plaintiffs, :
7 vs. : CASE NO.
8 AK STEEL CORPORATION, : C-1-02-467
9 Defendant. :

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11
12 Deposition of: PHYLLIS SHORT
13 Taken: By the Plaintiffs
14 Pursuant to Notice
15 Date: February 16, 2005
16 Time: Commencing at 11:35 a.m.
17 Place: Taft, Stettinius &
18 Hollister, LLP
425 Walnut Street
Suite 1800
Cincinnati, Ohio 45202
19
20 Before: Karen Volk, RPR
Notary Public - State of Ohio

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1 APPEARANCES:
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3 On behalf of the plaintiffs:
4 Robert F. Childs, Jr., Esq. (via telephone)
5 of
6 Wiggins, Childs, Quinn & Pantazis
7 301 19th Street
8 North Kress Building
9 Birmingham, Alabama 35203
and
10 David D. Kammer, Esq.
of
Tobias, Kraus & Torchia
911 Mercantile Library Building
414 Walnut Street
Cincinnati, Ohio 45202

22 fraudulently?

23 A. Again, we're talking about a candidate,
24 right?

25 Q. Yeah. I'm sorry, yes.

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1 MR. ROGERS: Bob, are you talking about
2 over-the-counter or prescription?

3 MR. CHILDS: I'm really talking about
4 prescription, excuse me.

5 A. Okay. I'm sorry, ask your question again.

6 Q. If an employee abuses the prescription
7 drugs and illegally obtains drugs through
8 prescriptions that he falsifies, would that be a
9 reason for -- even though it might not be an illegal
10 drug, a reason for not hiring an applicant?

11 A. If a candidate tells our physician that
12 they are taking a certain medication and they can
13 provide a prescription bottle, they're going to have
14 to have the prescription prescribed by their
15 physician.

16 MR. CHILDS: Okay. Can we take about a
17 five minute break? And, Dave, can you call me
18 or just stay on this line, let us have a
19 second?

20 (A recess was taken from 4:43 to 4:49.)
21 Q. I'm back to the proverbial one more
22 question.

23 Did I understand you to say, Ms. Short,
24 that AK Steel in Middletown has waived the
25 requirement of two years of manufacturing experience

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1 for minorities and females at any point in time from
2 January of 2000 to the present?

3 A. What I said was, if we had minority and
4 female candidates, we're much more willing to
5 consider them without the two years of manufacturing
6 experience than we would other candidates.

7 Q. Where is that consideration taken, at the
8 point in time the application comes back to AK Steel,
9 or when?

10 A. That consideration actually would have
11 been given to the bureaus.

12 Q. So are you saying that at some point in
13 time the bureaus were told not to enforce the two
14 years of manufacturing requirement at their initial
15 screens?

16 A. They would have been told to send us --
17 send AK as many applicants as they could who, you
18 know, had -- maybe they didn't have two years of
19 manufacturing experience but they had a year and let
20 us make the determination if they go through the
21 process.

22 Q. When did that occur?

23 A. Sir, I don't know.

24 Q. Would that have been true throughout the
25 whole time of January of 2000 to the present or just

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